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LAW OFFICE OF

JUSTIN A. ZELLER, P.C.

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March 16, 2021

VIA ECF

Hon. John P. Cronan, United States District Judge United States District Court for the Southern District of New York 500 Pearl Street, Courtroom 20C New York, NY 10007-131

Re: Carrion et al v. R.G. New York Tile, Inc. et al, 20 CV 5459 (JPC)

Dear Judge Cronan:

This firm represents the plaintiffs in the above-referenced action. The plaintiffs move for a two-week extension of today's deadline to submit the settlement agreement and fairness letter. The parties have a working draft of the fairness letter and have finalized the settlement agreement. The parties are currently working to get the settlement agreement executed, as soon as possible. In addition, the agreement calls for payment to be transmitted and held in escrow within 7 days of execution and before the parties move to dismiss. Therefore, the parties require more time to finalize the settlement and prepare the motion. This request for an extension is the second and the first request was granted. The defendants consent to this motion.

I thank the Court for its time and consideration.

Respectfully submitted,

John M. Gurrieri

John M. Gurrieri

Plaintiffs' request is granted. The parties shall file a *Cheeks* letter pursuant to the Court's Order dated February 16, 2021 (Dkt. 18) by March 30, 2021.

SO ORDERED.

Date: March 16, 2021

New York, New York

JOHN P. CRONAN United States District Judge